

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Dfinity Foundation,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY, et al.,

Defendants.

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) Case No. 1:22-cv-05418-LAK
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STIPULATION AND [PROPOSED] SCHEDULING ORDER

WHEREAS, on June 27, 2022, Plaintiff Dfinity Foundation filed its complaint in this action (the “Complaint”);

WHEREAS, on June 30, 2022, Defendant Arkham Intelligence, Inc. (“Arkham”) was served with the Summons and Complaint via its registered agent in Delaware;

WHEREAS, the parties, through their respective counsel, have conferred and agreed to a 57-day extension of the deadline for Defendants Arkham and Miguel Morel to respond to the Complaint such that Defendants Arkham and Morel shall respond to the Complaint no later than September 16, 2022; and

WHEREAS, the parties have not requested previously an extension of the deadline for Defendants Arkham and Morel to respond to the Complaint;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties to this action, as follows:

1. Defendants Arkham and Morel will move to dismiss or otherwise respond to the Complaint no later than September 16, 2022.

2. If Defendants Arkham and Morel move to dismiss the Complaint, Plaintiff will file its opposition papers no later than October 21, 2022, and Defendants Arkham and Morel will file their reply papers no later than November 11, 2022.

3. Nothing in this stipulation shall be (1) construed as a waiver of any defenses or rights available to the parties, or (2) used as evidence regarding the strength or validity of any claim or defense.

Dated: New York, New York
July 25, 2022

Pursuant to Section 8.5(b) of the Electronic Case Filing Rules & Instructions for the United States District Court for the Southern District of New York, the use of conformed electronic signatures is with the consent of all signatories to this filing.

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Intelligence, Inc., and Miguel Morel*

SO ORDERED.

Hon. Lewis A. Kaplan
United States District Judge